

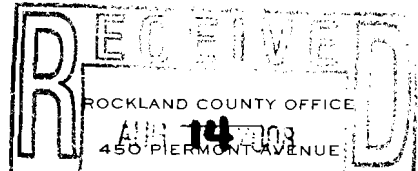
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# MEMO ENDORSED

**By Hand Delivery and By ECF Filing**

Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
40 Centre Street  
New York, New York 10007

RICHARD M. BERMAN	
<del>August 14, 2008</del>	
<u>Application granted.</u>	
SO ORDERED: Date: <u>8/15/08</u>	<u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.

Re: *Seneca Insurance Company v. Illinois  
National Insurance Company*  
Docket No. 07-cv-11272 (RMB)

Your Honor:

We represent the plaintiff, Seneca Insurance Company ("Seneca") in this matter. We write to request an extension of each of the deadlines set forth in the briefing schedule for summary judgment motions so-ordered by the Court on July 14, 2008.

The parties originally agreed to deadlines for a briefing schedule on summary judgment motions at the May 20, 2008 conference. As a result of that conference plaintiff's motion for summary judgment was due on July 21, 2008, defendant's response was due September 5, 2008, plaintiff's reply was due September 18, 2008 and defendant's sur-reply was due September 25, 2008. On July 14, 2008, the Court granted the parties' joint request to extend the foregoing deadlines. We are now requesting a further extension.

More specifically, we request that the due date for the plaintiff's motion be changed from August 21, 2008 to September 26, 2008, that the due date for the defendant's response be changed from October 6, 2008 to November 14, 2008, that the due date for the plaintiff's reply be changed from October 20, 2008 to December 3, 2008, and that the due date for the defendant's sur-reply be changed from October 27, 2008 until December 10, 2008.

SARETSKY KATZ DRANOFF & GLASS, L.L.P.

Hon. Berman  
Aug. 14, 2008  
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As discussed above, there has been one prior request for an adjournment or extension that was granted by the Court on July 14, 2008, and thus no previous request has been denied. In addition, counsel for the defendant, Illinois National Insurance Company has consented to and joins in this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Allen L. Sheridan", with a horizontal line extending from the end of the signature.

Allen L. Sheridan (ALS 0960)

ALS:eb

cc: **By Facsimile**

Law Offices of Green & Lavelle by Erika C. Aljens, Esq (by facsimile)

So Ordered: \_\_\_\_\_  
U.S.D.J.

Date: \_\_\_\_\_